

# EXHIBIT O

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RAFAEL FOX, et al., ) CIVIL DIVISION  
Plaintiffs, ) NO. 1:19-CV-04650-AJH-SN  
-vs- ) REMOTE VIDEO CONFERENCE  
 ) DEPOSITION OF  
 ) LESLIE FABLE  
 ) Filed on Behalf of the  
 ) Plaintiffs  
STARBUCKS CORPORATION, ) Counsel of Record For  
Defendant. ) This Party:  
 ) Ariel Graff, Esq.  
 ) Filosa Graff  
 ) 111 John Street  
 ) Suite 2510  
 ) New York, NY 10038

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CONFIDENTIAL TRANSCRIPT

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AGENCY

REMOTE VIDEO CONFERENCE DEPOSITION OF  
LESLIE FABLE, a witness herein, called by the  
Plaintiff for examination, taken pursuant to  
the Federal Rules of Civil Procedure, by and  
before Alyssa A. Repsik, a notary public in and  
for the Commonwealth of Pennsylvania, on  
Wednesday, September 29, 2020, at 12:00 p.m.

COUNSEL PRESENT:

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1 Q. Or whatever part you're looking  
2 at that seems like an important part, if you  
3 could just read out what it says and then we'll  
4 talk about it.

5 A. Okay. Just the same, "District 467  
6 end of year recognition and celebration, New  
7 York Metro, October 27th, 2017."

8 Q. And then in the right it says,  
9 "presented to," could you read that text?

10 A. "Presented to Rafael Fox, FY17,  
11 store operations and customer connection, 48  
12 and 25 West Broadway and Leonard.

13 Q. Could you explain what all of that  
14 bolded language means?

15 A. Yes. So, once again, the year ended  
16 in September, so October was a new fiscal year.  
17 There were no store manager -- not there were  
18 no store manager, the store -- at the time, the  
19 West Broadway and Leonard, they were No. 1 in  
20 store operations and customer connections  
21 score.

22 So the store operations score has to  
23 deal with the cleanliness of the store, et  
24 cetera, and customer connections is based on  
25 surveys that are sent out to customers, how

1 well the store is doing.

2 This actually happened under William  
3 Banfield's watch. He was in that location for  
4 the majority of the year. Once again, he left  
5 somewhere in 2017, around the summertime, I  
6 believe, or closer to August.

7 But at the time of this award, at  
8 the time I was handing this out, I couldn't  
9 hand it out to William Banfield, so it went to  
10 Rafael Fox because he was then now in that  
11 location.

12 Q. Okay. You had, a moment ago, used  
13 the word "reward" to refer to this document.

14 Does it have a more formal title or  
15 is there a term that's specific to describe  
16 recognitions of this sort?

17 A. No, it was just something that I did  
18 in my own district at the end of year to  
19 recognize the work that was done from store to  
20 store.

21 Q. Is that something that you wanted to  
22 do?

23 A. That's something I wanted to do,  
24 yes.

25 Q. Why did you want to do it?